

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

LIBERTY LEGAL FOUNDATION,
JOHN DUMMETT, LEONARD
VOLODARSKY, CREG MARONEY,

Plaintiffs,

VS.

NATIONAL DEMOCRATIC PARTY OF
THE USA, INC., DEMOCRATIC
NATIONAL COMMITTEE, TENNESSEE
DEMOCRATIC PARTY, DEBBIE
WASSERMAN SCHULTZ, and CHIP
FORRESTER,

Defendants.

Case No. 2:12-cv-02143-cgc

Removal of Case No. CH-11-1757-3 From
Chancery Court for the State of Tennessee
in Shelby County

**DEFENDANTS' MOTION FOR LEAVE TO FILE A
REPLY IN SUPPORT OF MOTION FOR SANCTIONS AND
MOTION FOR LEAVE TO EXCEED PAGE LIMITATION**

Defendants , the Tennessee Democratic Party (“TNDP”), and Chip Forrester (collectively the “TNDP Defendants”), hereby request leave of this Court to file a Reply in Support of Motion for Sanctions (Dkt. No. 25) addressing issues raised in Plaintiffs’ Response in Opposition to Defendants’ Motion for Sanctions (Dkt. No 29). A copy of the Reply is attached hereto as Exhibit A.

To fully address the issues raised in Plaintiffs' Response in Opposition to Defendants' Motion for Sanctions, the TNDP Defendants further request leave to file a Reply Memorandum not exceeding 15 pages.

Dated: June 18, 2012

By: /s/ J. Gerard Stranch, IV
J. Gerard Stranch, IV (BPR#023045)
Benjamin A. Gastel (BPR#028699)
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*Counsel for the Tennessee Democratic Party
and Chip Forrester*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served via the Court's CM/ECF system, on June 18, 2012, upon:

Van Irion
Liberty Legal Foundation
9040 Executive Park Dr., Ste. 200
Knoxville, TN 37923

/s/ J. Gerard Stranch, IV
J. Gerard Stranch, IV